

EXHIBIT A TO THE APPLICATION:

PROPOSED ORDER

ORDERED that:

1. The Application be, and hereby is, granted in its entirety.
2. Pursuant to Sections 328 and 1103(a) of the Bankruptcy Code and the Appointment Order, Roger Frankel (the “FCR”) be, and he hereby is, authorized to employ and retain FW LLP as bankruptcy co-counsel, effective as of January 16, 2014, upon the terms, and to perform the services, set forth in the Application and the Wyron Declaration, so long as Roger Frankel serves as the FCR in these cases for individuals who may assert asbestos-related personal injury claims and/or demands in the future against the Debtors.
3. Compensation, including professional fees and reimbursement of expenses, shall be payable to FW LLP from the Debtors’ estates, in accordance with the procedures set forth in Sections 330 and 331 of the Bankruptcy Code and the terms and conditions described in the Application and the Wyron Declaration, subject to approval by this Court and subject to the Administrative Compensation Order entered in these cases.
4. The fees and expenses of FW LLP allowed by the Court shall be an administrative expense of the Debtors’ estates.

Dated: _____, 2014

Honorable Kevin J. Carey
United States Bankruptcy Judge